

From: bbarta@midrivers.com [mailto:bbarta@midrivers.com]
Sent: Wednesday, April 12, 2006 9:27 PM
To: Benham, Katherine
Subject:

Dear Katherine Benham:

I am signing up for public comment at the 4/19 NOSB meeting.

I am concerned about the need for clarity, fairness and ethical organic standards. While many questions have been posed for consideration at the April 2006 meetings, there are some essential issues that we address below that will answer the basic and most important issues related to pasture and organic dairy farming. We, the undersigned, believe that the following points are essential components of organic farming.

- a) After a dairy operation has transitioned to organic production and been certified, all animals brought onto the operation must be certified as organically raised from the last third of gestation, just as all young stock on the farm need to be under continuous organic management.
- b) Dairy herd conversion must be a one-time only opportunity to encourage transition, but not be used to continuously bring non-organic animals into an organic herd.
- c) Organic dairy livestock over 6 months of age must graze on pasture during the months of the year when pasture can provide edible forage. The grazed feed must provide significant intake, at minimum 30% of the dry matter intake during the growing season but for no less than 120 days per year. This provision must be for all cows, whether dry or lactating. In order to protect soil and water quality, stocking rate must not exceed 3 cows per acre and in most cases stocking rate must be far below 3 cows per acre in order to reach and exceed the minimum intake and to protect the ecological and feed value of the pasture as required by other sections of the regulations.

Thank you for accepting our comments.

Sincerely,

Name of farmer (s)

Robert Barta

Farm Name:

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